



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.IN.gov/idem

Mr. Jeffrey Chiddister
Dutchmen Manufacturing, Inc.
305 Steury Ave.
Goshen, IN 46526

Re: **085-15722**
First Significant Revision to
FESOP 085-14032-00067

Dear Mr. Chiddister:

Dutchmen Manufacturing, Inc. was issued a permit on September 18, 2001, for the travel trailer and camper manufacturing source. A first Administrative Amendment (085-15111) was issued on January 29, 2002. A letter requesting changes to this permit was received on June 11, 2002. Pursuant to the provisions of 326 IAC 2-8-11.1 a Significant Permit Revision to this permit is hereby approved as described in the attached Technical Support Document.

This revision consists of re-organizing the facilities to make the process more efficient. There are changes in the materials and specific equipment used for each process, and the overall methods of operation. This results in changes in the emission rates, applicable rules, and permit limitations.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. For your convenience, the entire revised FESOP, with all revisions and amendments made to it, is being provided.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact CarrieAnn Paukowits, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Original signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
CAP/MES

cc: File - Kosciusko County
U.S. EPA, Region V
Kosciusko County Health Department
Northern Regional Office
Air Compliance Section Inspector - Doyle Houser
Compliance Branch - Karen Nowak
Administrative and Development - Lisa Lawrence
Technical Support and Modeling - Michele Boner



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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Dutchmen Manufacturing, Inc.
925 W. Brooklyn
Syracuse, IN 46567**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 085-14032-00067	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: September 18, 2001 Expiration Date: September 18, 2006

First Administrative Amendment 085-15111-00067, issued on January 29, 2002

First Significant FESOP Revision: 085-15722-00067	Sections Affected: A.2, A.3, and D.1; C.12, C.14, C.17 and D.2 are removed and D.3 renamed D.2
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 16, 2003

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SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary travel trailer camper manufacturing source.

Authorized Individual:	Rich Florea
Source Address:	925 W. Brooklyn, Syracuse, IN 46567
Mailing Address:	305 Steury Ave., Goshen, IN 46526
General Source Phone Number:	219-457-8385
SIC Code:	3792
County Location:	Kosciusko
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) lamination machine located in Plant #1, constructed in February 1996, exhausting to vents V3 and V4, using roll coaters, bead coating, plastic squeeze bottles and wiping to apply material, capacity: 5.5 campers or trailers per hour.
- (b) One (1) travel trailer production line, consisting of the following:
 - (1) One (1) woodworking area located in Plant #4, constructed in February 1995, consisting of saws, a sander and a router, equipped with a cyclone (DC-2) and exhausting to stack DC2, capacity: 2.5 trailers (24.4 pounds of wood input) per hour.
 - (2) One (1) travel trailer assembly area, located in Plant #4, using spray cans, brushes, and wiping to apply materials, capacity: 2.5 trailers per hour.
 - (3) One (1) travel trailer final finishing line, located in Plant #3, constructed in August 2002, using spray cans and wiping to apply materials and equipped with a baghouse (PB) for particulate emissions from saws exhausting to stack PB, capacity: 2.5 trailers per hour.
 - (4) One (1) travel trailer touch-up and repair area, located in Plant #3, equipped with two (2) airless paint guns and also using wiping to apply materials, capacity: 0.5 trailer per hour.
- (c) One (1) fold-down camper production line, consisting of the following:
 - (1) One (1) woodworking area located in Plant #1, consisting of saws, a sander and a router, constructed in February 1995, equipped with a cyclone (DC-1) and exhausting to stack DC1, capacity: 3.0 fold-down campers (18.6 pounds of wood input) per

hour.

- 2) ne (1) fold-down camper assembly and final finishing line, located in Plant #2, using spray cans, brushes, squeeze bottles, wiping, roller coating, and one (1) airless paint gun, exhausting to vents V3 and V4, capacity: 3.0 campers per hour.
- (3) One (1) fold-down camper touch-up and repair area, located in Plant #2, equipped with two (2) airless paint guns and also using spray cans to apply materials, capacity: 0.5 camper per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Welding Stations, using less than 625 pounds of rod or weld wire per day.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
 - (1) Twenty-two (22) radiant heaters, identified as H1 through H22, capacity: 0.06 million British thermal unit per hour, each.
 - (2) Four (4) radiant heaters, identified as H23 through H26, capacity: 0.1 million British thermal unit per hour, each.
 - (3) Seven (7) radiant heaters, identified as H29 through H33, H35 and H64, capacity: 0.20 million British thermal unit per hour, each.
 - (4) Five (5) space heaters, identified as H34, H36 through H38 and H45, capacity: 0.3 million British thermal unit per hour, each.
 - (5) Ten (10) space heaters, identified as H39 through H44 and H46 through H49, capacity: 0.25 million British thermal unit per hour, each.
 - (6) One (1) space heater, identified as H50, capacity: 0.075 million British thermal unit per hour.
 - (7) Two (2) radiant heaters, identified as H51 and H57, capacity: 0.175 million British thermal unit per hour, each.
 - (8) Five (5) radiant heaters, identified as H55, H56, H58, H59 and H60, capacity: 0.25 million British thermal unit per hour, each.
 - (9) Four (4) radiant heaters, identified as H54 and H61 through H63, capacity: 0.15 million British thermal units per hour, each.
- (c) Propane, liquified petroleum gas or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour, including tow trucks.
- (d) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight, including tow trucks.

- (e) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. This facility has a storage capacity of 250 gallons.
- (f) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. This is a diesel fuel dispensing facility with a storage capacity of 300 gallons.
- (g) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (h) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (i) Paved and unpaved roads and parking lots with public access. All roads are paved.
- (j) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (k) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (l) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling towers.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

SECTION B

GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ,

copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]

- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
 - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
 - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
 - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
- (2) The permitted facility was at the time being properly operated;
- (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
- (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ / Northern Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,

Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

Northern Regional Office:
Telephone No.: 219-245-4870
Facsimile No.: 219-245-4877

Failure to notify IDEM, OAQ / Northern Regional Office, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
- (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
- (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
- (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
- (g) Operations may continue during an emergency only if the following conditions are met:
 - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
 - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
 - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
 - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
 - (2) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.

A Permittee’s failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such informa-

tion shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326

IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-11(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C

SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

- (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)).
- (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
- (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.

(c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2. 326 IAC 9-1-2 is not federally enforceable.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted. The provisions of 326 IAC 1-7-2, 326 IAC 1-7-3(c) and (d), 326 IAC 1-7-4(d)(3), (e), and (f), and 326 IAC 1-7-5(d) are not federally enforceable.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ, not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance

with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.
- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days from the date of issuance of this permit.

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The

Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.18 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) One (1) lamination machine located in Plant #1, constructed in February 1996, exhausting to vents V3 and V4, using roll coaters, bead coating, plastic squeeze bottles and wiping to apply material, capacity: 5.5 campers or trailers per hour.
- (b) One (1) travel trailer production line, consisting of the following:
 - (1) One (1) woodworking area located in Plant #4, constructed in February 1995, consisting of saws, a sander and a router, equipped with a cyclone (DC-2) and exhausting to stack DC2, capacity: 2.5 trailers (24.4 pounds of wood input) per hour.
 - (2) One (1) travel trailer assembly area, located in Plant #4, using spray cans, brushes, and wiping to apply materials, capacity: 2.5 trailers per hour.
 - (3) One (1) travel trailer final finishing line, located in Plant #3, constructed in August 2002, using spray cans and wiping to apply materials and equipped with a baghouse (PB) for particulate emissions from saws exhausting to stack PB, capacity: 2.5 trailers per hour.
 - (4) One (1) travel trailer touch-up and repair area, located in Plant #3, equipped with two (2) airless paint guns and also using wiping to apply materials, capacity: 0.5 trailer per hour.
- (c) One (1) fold-down camper production line, consisting of the following:
 - (1) One (1) woodworking area located in Plant #1, consisting of saws, a sander and a router, constructed in February 1995, equipped with a cyclone (DC-1) and exhausting to stack DC1, capacity: 3.0 fold-down campers (18.6 pounds of wood input) per hour.
 - (2) One (1) fold-down camper assembly and final finishing line, located in Plant #2, using spray cans, brushes, squeeze bottles, wiping, roller coating, and one (1) airless paint gun, exhausting to vents V3 and V4, capacity: 3.0 campers per hour.
 - (3) One (1) fold-down camper touch-up and repair area, located in Plant #2, equipped with two (2) airless paint guns and also using spray cans to apply materials, capacity: 0.5 camper per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- (a) The VOC usage at the one (1) travel trailer production line shall be limited to less than fifteen (15) pounds per day when coating metal parts. This will limit the potential to emit VOC from the one (1) travel trailer production line to less than fifteen (15) pounds per day when coating metal parts, and shall make the requirements of 326 IAC 8-2-9, Miscellaneous Metal Coating Operations, not applicable.
- (b) The VOC usage at the one (1) fold-down camper production line shall be limited to less than fifteen (15) pounds per day when coating metal parts. This will limit the potential to emit VOC from the one (1) fold-down camper production line to less than fifteen (15) pounds per day

when coating metal parts, and shall make the requirements of 326 IAC 8-2-9, Miscellaneous Metal Coating Operations, not applicable.

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-11]

Pursuant to 326 IAC 8-2-11, the VOC content of coating delivered to the applicators for fabric coating shall be limited to 0.35 kilograms of VOC per liter (2.9 pounds per gallon) of coating excluding water, and the VOC content of coating delivered to the applicator for vinyl coating shall be limited to 0.58 kilograms of VOC per liter (4.8 pounds per gallon) of coating excluding water.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) Any change or modification which increases the potential to emit of VOC from the one (1) fold-down camper line to 25.0 tons per year or more shall require prior approval from IDEM, OAQ prior to making the change.
- (b) The VOC usage from the total of all operations at the one (1) travel trailer production line shall be limited to less than 25 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month. This will limit the potential to emit VOC from the one (1) travel trailer production line to less than 25 tons per year, and make the requirements of 326 IAC 8-1-6 not applicable.

D.1.4 HAPs [326 IAC 2-4-1.1]

Any change or modification which may increase potential to emit any combination of HAPs from the entire source to twenty-five (25) tons per year or any single HAP to ten (10) tons per year or more shall require approval from IDEM, OAQ prior to making the change.

D.1.5 PM₁₀ [326 IAC 2-8-4]

Any change or modification that increases the combined potential to emit PM₁₀ from the woodworking area for the travel trailer production line, the woodworking area for the fold-down camper production line, and the saws at the travel trailer final finishing line to 21.0 pounds per hour or more shall cause the potential to emit PM₁₀ from the entire source to be one hundred (100) tons per year or more and shall require prior IDEM, OAQ, approval.

D.1.6 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM from the one (1) travel trailer production line and the one (1) fold-down camper production line shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

D.1.7 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), the particulate emission rate from each woodworking area shall not exceed 0.551 pound per hour, when operating at a process weight rate less than one hundred (100) pounds per hour.

D.1.8 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.9 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1, D.1.2 and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.10 Particulate

The cyclones/dust collectors for particulate control shall be in operation and control emissions from the woodworking area for the travel trailer production line and the woodworking area for the fold-down camper production line at all times that these facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no specific Compliance Monitoring Requirements applicable to these emission units.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.11 Record Keeping Requirements

- (a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.
 - (1) The VOC content of each coating material and solvent used on metal parts;
 - (2) The cleanup solvent usage for each day, when coating metal parts;
 - (3) The total VOC usage for each day, when coating metal parts; and
 - (4) The weight of VOCs emitted, when coating metal parts, for each compliance period.
- (b) To document compliance with Conditions D.1.3 and D.1.4 the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.3 and D.1.4.
 - (1) The VOC and HAP content of each coating material and solvent used;
 - (2) The cleanup solvent usage for each month;
 - (3) The total VOC and HAP usage for each month; and
 - (4) The weight of VOCs and HAPs emitted for each compliance period.
- (c) To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content limits established in Condition D.1.2.
 - (1) The VOC content of each coating material and solvent used on fabric and vinyl.

- (2) The amount of coating material and solvent used less water on daily basis for all fabric and vinyl coating.
 - (A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
 - (B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.12 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.3(b) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (a) Welding Stations, using less than 625 pounds of rod or weld wire per day.
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:
 - (1) Twenty-two (22) radiant heaters, identified as H1 through H22, capacity: 0.06 million British thermal unit per hour, each.
 - (2) Four (4) radiant heaters, identified as H23 through H26, capacity: 0.1 million British thermal unit per hour, each.
 - (3) Seven (7) radiant heaters, identified as H29 through H33, H35 and H64, capacity: 0.20 million British thermal unit per hour, each.
 - (4) Five (5) space heaters, identified as H34, H36 through H38 and H45, capacity: 0.3 million British thermal unit per hour, each.
 - (5) Ten (10) space heaters, identified as H39 through H44 and H46 through H49, capacity: 0.25 million British thermal unit per hour, each.
 - (6) One (1) space heater, identified as H50, capacity: 0.075 million British thermal unit per hour.
 - (7) Two (2) radiant heaters, identified as H51 and H57, capacity: 0.175 million British thermal unit per hour, each.
 - (8) Five (5) radiant heaters, identified as H55, H56, H58, H59 and H60, capacity: 0.25 million British thermal unit per hour, each.
 - (9) Four (4) radiant heaters, identified as H54 and H61 through H63, capacity: 0.15 million British thermal units per hour, each.
- (c) Propane, liquified petroleum gas or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour, including tow trucks.
- (d) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight, including tow trucks.
- (e) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. This facility has a storage capacity of 250 gallons.
- (f) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. This is a diesel fuel dispensing facility with a storage capacity of 300 gallons.

- (g) The following VOC and HAP storage containers:
- (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- (h) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- (i) Paved and unpaved roads and parking lots with public access. All roads are paved.
- (j) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (k) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.
- (l) Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling towers.
- (The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Particulate Matter (PM) [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the welding operations shall be limited by the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Branch

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION

Source Name: Dutchmen Manufacturing, Inc.
Source Address: 925 W. Brooklyn, Syracuse, IN 46567
Mailing Address: 305 Steury Ave., Goshen, IN 46526
FESOP No.: F 085-14032-00067

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Phone:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: Dutchmen Manufacturing, Inc.
Source Address: 925 W. Brooklyn, Syracuse, IN 46567
Mailing Address: 305 Steury Ave., Goshen, IN 46526
FESOP No.: F 085-14032-00067

This form consists of 2 pages

Page 1 of 2

- | |
|--|
| <p>9 This is an emergency as defined in 326 IAC 2-7-1(12)</p> <ul style="list-style-type: none"><input type="checkbox"/> The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and<input type="checkbox"/> The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |
|--|

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

FESOP Monthly Report, submitted quarterly

Source Name: Dutchmen Manufacturing, Inc.
Source Address: 925 W. Brooklyn, Syracuse, IN 46567
Mailing Address: 305 Steury Ave., Goshen, IN 46526
FESOP No.: F 085-14032-00067
Facility: One (1) travel trailer production line
Parameter: VOC usage when coating metal parts
Limit: Less than 15.0 pounds per day

Months: _____ Year: _____

Day	VOC usage	VOC usage	VOC usage	Day	VOC usage	VOC usage	VOC usage
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				No. of deviations			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

FESOP Monthly Report, submitted quarterly

Source Name: Dutchmen Manufacturing, Inc.
Source Address: 925 W. Brooklyn, Syracuse, IN 46567
Mailing Address: 305 Steury Ave., Goshen, IN 46526
FESOP No.: F 085-14032-00067
Facility: One (1) fold-down camper production line
Parameter: VOC usage when coating metal parts
Limit: Less than 15.0 pounds per day

Months: _____ Year: _____

Day	VOC usage	VOC usage	VOC usage	Day	VOC usage	VOC usage	VOC usage
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				No. of deviations			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Dutchmen Manufacturing, Inc.
Source Address: 925 W. Brooklyn, Syracuse, IN 46567
Mailing Address: 305 Steury Ave., Goshen, IN 46526
FESOP No.: F 085-14032-00067
Facility: One (1) travel trailer production line
Parameter: VOC usage
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month

YEAR: _____

Month	VOC usage	VOC usage	VOC usage
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Dutchmen Manufacturing, Inc.
Source Address: 925 W. Brooklyn, Syracuse, IN 46567
Mailing Address: 305 Steury Ave., Goshen, IN 46526
FESOP No.: F 085-14032-00067

Months: _____ to _____ Year: _____

Page 1 of 2

This report is an affirmation that the source has met all the requirements stated in this permit. This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)

Date of Deviation:

Duration of Deviation:

Number of Deviations:

Probable Cause of Deviation:

Response Steps Taken:

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Addendum to the Technical Support Document for a
Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP)

Source Name:	Dutchmen Manufacturing, Inc.
Source Location:	925 W. Brooklyn, Syracuse, Indiana 46567
County:	Kosciusko
SIC Code:	3792
Operation Permit No.:	F 085-14032-00067
Operation Permit Issuance Date:	September 18, 2001
Significant Permit Revision No.:	SPR 085-15722-00067
Permit Reviewer:	CarrieAnn Paukowits

On December 13, 2002, the Office of Air Quality (OAQ) had a notice published in the Times Union, Warsaw, Indiana, stating that Dutchmen Manufacturing, Inc. had applied for a Significant Permit Revision to a Federally Enforceable State Operating Permit (FESOP) for changes in the materials and specific equipment used for each process, and the overall methods of operation, at the stationary travel trailer camper manufacturing source. The notice also stated that OAQ proposed to issue a Significant Permit Revision to a FESOP for this operation and provided information on how the public could review the proposed Significant Permit Revision to a FESOP and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this Significant Permit Revision to a FESOP should be issued as proposed.

Upon further review, the OAQ has decided to make the following change to the FESOP: The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language is **bolded**):

The spelling of the mailing address and the zip code have been corrected in Section A.1 and on all forms as follows:

305 ~~Stuery~~ **Steury** Ave., Goshen, IN ~~46562~~ **46526**

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Significant Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	Dutchmen Manufacturing, Inc.
Source Location:	925 W. Brooklyn, Syracuse, Indiana 46567
County:	Kosciusko
SIC Code:	3792
Operation Permit No.:	F 085-14032-00067
Operation Permit Issuance Date:	September 18, 2001
Significant Permit Revision No.:	SPR 085-15722-00067
Permit Reviewer:	CarrieAnn Paukowits

The Office of Air Quality (OAQ) has reviewed a significant permit revision application from Dutchmen Manufacturing, Inc. relating to the construction and operation of the following emission units and pollution control devices:

The source constructed the initial travel trailer and fold-down camper lines in February 1995. This modification consists of re-organizing the facilities to make the process more efficient. There are changes in the materials and specific equipment used for each process, and the overall methods of operation. This results in changes in the emission rates, applicable rules, and permit limitations. The changes are as follows:

Emission Units and Pollution Control Equipment

- (a) **One (1) lamination machine located in Plant #1, constructed in February 1996, exhausting to vents V3 and V4, using roll coaters, bead coating, plastic squeeze bottles and wiping to apply material, capacity: 5.5 campers or trailers per hour.**
- (b) **One (1) travel trailer production line, consisting of the following:**
 - ~~(e)~~(1) **One (1) woodworking area located in Plant ~~#3~~ #4, constructed in February 1995, consisting of ~~saws, a sander and a router~~ various woodworking equipment, equipped with a cyclone (DC-2) and exhausting to stack DC2 with a process weight rate of 978 pounds of wood per hour, capacity: 2.5 trailers (24.4 pounds of wood input) per hour.**
 - (2) **One (1) travel trailer assembly area, located in Plant #4, using spray cans, brushes, and wiping to apply materials, capacity: 2.5 trailers per hour.**
 - ~~(b)~~(3) **One (1) ~~short and one (1) long~~ travel trailer final finishing line, located in Plant ~~#2~~ #3, constructed in August 2002, using spray cans and wiping to apply materials and equipped with a baghouse (PB) for particulate emissions from ~~saws three (3) airless paint guns~~, exhausting to stack PB, capacity: ~~5.74~~ 2.5 trailers per hour.**

- (4) **One (1) travel trailer touch-up and repair area, located in Plant #3, equipped with two (2) airless paint guns and also using wiping to apply materials, capacity: 0.5 trailer per hour.**
- (c) **One (1) fold-down camper production line, consisting of the following:**
 - ~~(a)~~(1) **One (1) woodworking area located in Plant #1, consisting of ~~various woodworking equipment~~ **saws, a sander and a router, constructed in February 1995,** equipped with a cyclone (DC-1) **and exhausting to stack DC1, with a process weight rate of 2,760 pounds of wood per hour** **capacity: 3.0 fold-down campers (18.6 pounds of wood input) per hour.****
 - ~~(d)~~(2) ~~The Dutchman Plant, consists of:~~
 - (4) **One (1) fold-down camper ~~assembly and final finishing~~ line, located in Plant #2, equipped with ~~using spray cans, brushes, squeeze bottles, wiping, roller coating, and~~ one (1) airless paint gun and one (1) laminating machine, exhausting to vents V3 and V4, capacity: ~~7.14~~ **3.0** campers per hour.**
 - ~~(2) — One (1) woodworking area, consisting of various woodworking equipment, equipped with a cyclone (DC-3) with a process weight rate of 34,200 pounds of wood per hour.~~
 - (3) **One (1) fold-down camper touch-up and repair area, located in Plant #2, equipped with two (2) airless paint guns and also using spray cans to apply materials, capacity: 0.5 camper per hour.**

Insignificant Activities

- ~~(a) — Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.~~
- ~~(b)~~(a) **Welding Stations (326 IAC 6-3-2), using less than 625 pounds of rod or weld wire per day.**
- ~~(e)~~(b) **Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:**
 - (1) **Twenty-two (22) radiant heaters, identified as H1 through H22, capacity: 0.06 million British thermal unit per hour, each.**
 - (2) **Four (4) radiant heaters, identified as H23 through H26, capacity: 0.1 million British thermal unit per hour, each.**
 - (3) **Seven (7) radiant heaters, identified as H29 through H33, H35 and H64, capacity: 0.20 million British thermal unit per hour, each.**
 - (4) **Five (5) space heaters, identified as H34, H36 through H38 and H45, capacity: 0.3 million British thermal unit per hour, each.**

- (5) Ten (10) space heaters, identified as H39 through H44 and H46 through H49, capacity: 0.25 million British thermal unit per hour, each.
- (6) One (1) space heater, identified as H50, capacity: 0.075 million British thermal unit per hour.
- (7) Two (2) radiant heaters, identified as H51 and H57, capacity: 0.175 million British thermal unit per hour, each.
- (8) Five (5) radiant heaters, identified as H55, H56, H58, H59 and H60, capacity: 0.25 million British thermal unit per hour, each.
- (9) Four (4) radiant heaters, identified as H54 and H61 through H63, capacity: 0.15 million British thermal units per hour, each.
- (c) Propane, liquified petroleum gas or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour, including tow trucks.
- (d) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight, including tow trucks.
- (e) A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. This facility has a storage capacity of 250 gallons.
- (f) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. This is a diesel fuel dispensing facility with a storage capacity of 300 gallons.
- (g) The following VOC and HAP storage containers:
 - (1) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
 - (2) Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.
- ~~(d)~~(h) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- ~~(e)~~(i) Paved and unpaved roads and parking lots with public access. **All roads are paved.**
- (j) Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.
- (k) Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.

- (I) **Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling towers.**

History

On June 11, 2002, Dutchmen Manufacturing, Inc., formerly Aero Manufacturing, Inc. and Aero Coach, submitted an application to the OAQ requesting to re-organize the production lines and change the methods of operation at their existing plant. Dutchmen Manufacturing, Inc. was issued a Federally Enforceable State Operating Permit (FESOP) on September 18, 2001. First Administrative Amendment 085-15111-00067 was issued on January 29, 2002.

Enforcement Issue

- (a) IDEM is aware that the modification has been constructed and operated prior to receipt of the proper permit.
- (b) IDEM is reviewing this matter and will take appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (EF)
DC-1	Plant #1 woodworking	26.5	1.7	3,900	Ambient
DC-2	Plant #4 woodworking	26.5	2.0	3,900	Ambient

Recommendation

The staff recommends to the Commissioner that the FESOP Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on June 11, 2002. On August 30, 2002, the applicant submitted more information and indicated that the initial application was invalid. A new application was received on September 30, 2002, and additional information was received on November 8 and December 3, 2002.

Emission Calculations

See pages 1 through 3 of 3 of Appendix A of this document for detailed emissions calculations.

Potential To Emit of Revision

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls for this revision. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Since the Permittee re-organized the entire source and changed the methods of operation, the potential to emit of the revision is also the unrestricted potential to emit of the entire source.

Pollutant	Potential To Emit (tons/year)
PM	29.1
PM ₁₀	29.1
SO ₂	3.00
VOC	53.7
CO	5.00
NO _x	5.00

HAPs	Potential To Emit (tons/year)
Vinyl acetate	0.266
Methanol	1.30
Toluene	0.990
Hexane	1.20
DEHP	0.0002
MEK	1.66
Xylene	0.186
Dibutylphthalate	0.179
Ethyl benzene	0.040
Styrene	0.157
Formaldehyde	0.00004
Glycol Ethers	0.221
HDI	0.002
MDI	1.72
TOTAL	9.92

Justification for Revision

Since the source is changing the methods of operation, the emissions are re-calculated for the updated source. Thus, the permitting level is determined based on the new potential to emit of the source and not an increase or decrease in the overall potential to emit. In addition, all rule applicabilities are re-evaluated based on the changes to the source.

The FESOP is being revised through a FESOP Significant Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(f)(1) since the potentials to emit VOC, PM and PM₁₀ from this revision are greater than twenty five (25) tons per year.

County Attainment Status

The source is located in Kosciusko County.

Pollutant	Status
PM ₁₀	attainment
SO ₂	attainment
NO ₂	attainment
Ozone	attainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Kosciusko County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Kosciusko County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (tons/year)
PM	163
PM ₁₀	less than 100
SO ₂	3.00
VOC	52.8
CO	3.00
NO _x	3.00

- (a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not one of the 28 listed source categories.
- (b) These emissions are based upon the Potential to Emit After Issuance table in the Technical Support Document to F 085-14032-00067, issued on September 18, 2001.

Potential to Emit of Revision After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this FESOP revision.

	Potential to Emit (tons/year)						
Process/facility	PM	PM ₁₀	SO ₂	VOC	CO	NO _x	HAPs
Proposed Revision	14.3	29.1	3.00	43.8	5.00	5.00	9.92
PSD Threshold Level	250	250	250	250	250	250	-

- (a) This revision to an existing minor stationary source is not major because the emission increase is less than the PSD threshold levels. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.
- (b) The potential to emit of this revision is also the potential to emit of the entire source because the entire source was re-organized for this modification. As a result of this change, the unrestricted potential to emit of each criteria pollutant is less than the Title V major source levels. However, the applicant has requested that this source remain a FESOP source due to expected modifications in the future. Therefore, this revision to the existing FESOP will **not** change the status of the stationary source because the emissions from the entire source will still be limited to less than the Part 70 major source thresholds.
- (c) The potential to emit PM is limited by the 326 IAC 6-3-2 limits for the one (1) woodworking area for the fold-down camper line and the one (1) woodworking area for the travel trailer line, and the potential to emit VOC is limited by the VOC limitation for the travel trailer line, which makes 326 IAC 8-1-6 not applicable.

Federal Rule Applicability

- (a) There are still no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) This source does not coat metal furniture. Therefore, the requirements of 40 CFR 60, Subpart EE, Standards of Performance for Surface Coating of Metal Furniture, are not applicable.
- (c) The travel trailers and fold-down campers assembled at this source are not automobiles or light duty trucks. Therefore, the requirements of 40 CFR 60, Subpart MM, Standards of Performance for Automobile and Light Duty Truck Surface Coating Operations, are not applicable.

- (d) This source is still not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), Subpart JJ, because the source does not have the potential to emit ten (10) tons per year for any single HAP and less than twenty five (25) tons per year for any combination of HAPs, and the source does not coat wood furniture or cabinets.

State Rule Applicability - Individual Facilities

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

The unrestricted potential to emit each criteria pollutant from this source, constructed after August 7, 1977, is less than 250 tons per year, and this source is not in one of the twenty-eight (28) listed source categories. Therefore, the requirements of 326 IAC 2-2, PSD, are not applicable.

326 IAC 2-4.1-1 (New Source Toxics Control)

The potential to emit each individual hazardous air pollutant (HAP) is less than ten (10) tons per year and the potential to emit any combination of HAPs is less than twenty-five (25) tons per year from the total of all facilities at this source. Therefore, this source will emit levels of air toxics less than those which constitute a major source according to Section 112 of the 1990 Clean Air Act Amendments, and the requirements of 326 IAC 2-4.1-1, New Source Toxics Control, are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is located in Kosciusko County and the potential to emit VOC, NO_x, SO₂, CO and PM₁₀ is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 still does not apply.

326 IAC 5-1 (Visible Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

- (a) On June 12, 2002, revisions to 326 IAC 6-3 (Particulate Emission Limitations for Manufacturing Processes) became effective; this rule was previously referred to as 326 IAC 6-3 (Process Operations). As of the date this permit is being issued these revisions have not been approved by EPA into the Indiana State Implementation Plan (SIP); therefore, the following requirements from the previous version of 326 IAC 6-3 (Process Operations) which has been approved into the SIP will remain applicable requirements until the revisions to 326 IAC 6-3 are approved into the SIP and the condition is modified in a subsequent permit action.

- (1) 326 IAC 6-3-2 (Process Operations)
Pursuant to F 085-14032-00067, issued on September 18, 2001, and 40 CFR 52 Subpart P the particulate matter (PM) from the travel trailer production line and the fold-down camper production line shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

The potential PM emissions from the surface coating manufacturing processes are less than 0.551 pounds per hour. Therefore, pursuant to 326 IAC 6-3-1(a)(14) the surface coating manufacturing processes at this source are exempt from the requirements of this rule, under the rule revision.

- (2) 326 IAC 6-3-2 (Process Operations)
The particulate matter (PM) from the welding operations shall be limited by the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where} \quad E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour.}$$

The insignificant welding operations use less than 625 pounds of weld wire/rod per day. Therefore, the welding is exempt from the requirements of 326 IAC 6-3, pursuant to 326 IAC 6-3-1(b)(9), under the rule revision.

- (b) Each woodworking area has a process weight rate less than 100 pounds per hour. Therefore, Pursuant to 326 IAC 6-3-2(e)(2), the particulate emission rate from each woodworking area shall not exceed 0.551 pound per hour.

- (1) The potential to emit particulate from the one (1) woodworking area for the travel trailer line, equipped with a cyclone (DC-2), is less than 0.551 pound per hour after control by the cyclone. Therefore, the woodworking area will comply with the requirements of 326 IAC 6-3-2.
- (2) The potential to emit particulate from the one (1) woodworking area for the fold-down camper line, equipped with a cyclone (DC-1), is less than 0.551 pound per hour after control by the cyclone. Therefore, the woodworking area will comply with the requirements of 326 IAC 6-3-2.

- (c) The potential to emit particulate from the saws at the travel trailer final finishing line, equipped with a baghouse (PB), is less than 0.551 pound per hour before control by the baghouse. Therefore, pursuant to 326 IAC 6-3-1(a)(14) the saws at the travel trailer final finishing line are exempt from the requirements of this rule.

326 IAC 8-1-6 (New facilities; General reduction requirements)

Some materials not covered by 326 IAC 8-2 are coated at the travel trailer line and fold-down camper line, such as fiberglass, wood, and fiberglass reinforced plastics.

- (a) The potential VOC emissions from the fold-down camper line are less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.
- (b) The VOC usage at the travel trailer line shall be limited to less than twenty-five (25) tons per twelve consecutive month period, with compliance demonstrated at the end of each month. Therefore, the potential VOC emissions are limited to less than twenty-five (25) tons per year, and the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 8-2-2 (Automobile and Light Duty Truck Coating Operations)

The travel trailers and fold-down campers assembled at this source are not passenger cars or passenger car derivatives. Therefore, the requirements of 326 IAC 8-2-2 are not applicable.

326 IAC 8-2-6 (Metal Furniture Coating Operations)

This source does not coat any metal furniture. Therefore, the requirements of 326 IAC 8-2-6 are not applicable.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

This source coats miscellaneous metal products under SIC 37. Therefore, pursuant to 326 IAC 8-2-9(a)(5) the requirements of 326 IAC 8-2-9 can be applicable. The VOC usage at the travel trailer line shall be limited to less than fifteen (15) pounds per day when coating metal parts, and the VOC usage at the fold-down camper line shall be limited to less than fifteen (15) pounds per day when coating metal parts. Therefore, the VOC emissions from each coating line are limited to less than fifteen (15) pounds per day when coating metal parts, and, pursuant to 326 IAC 8-2-1, the requirements of 326 IAC 8-2-9 are not applicable.

326 IAC 8-2-10 (Flat Wood Panels; Manufacturing Operations)

This source does not coat any flat wood panels that are considered printed panels, natural finish hardwood plywood panels, or hardboard paneling with Class II finishes. Therefore, the requirements of 326 IAC 8-2-10 are not applicable.

326 IAC 8-2-11 (Fabric and Vinyl Coating)

This source coats some fabric and vinyl parts, including vinyl trailer and camper roofing and fabric carpets, and the VOC emissions are greater than fifteen (15) pounds per day. Therefore, the source is subject to the requirements of 326 IAC 8-2-11. The VOC content of coating delivered to the applicators for fabric coating shall be limited to 0.35 kilograms of VOC per liter (2.9 pounds per gallon) of coating excluding water, and the VOC content of coating delivered to the applicator for vinyl coating shall be limited to 0.58 kilograms of VOC per liter (4.8 pounds per gallon) of coating excluding water. Based on the MSDS submitted by the source and calculations made, the coating lines are in compliance with this requirement.

326 IAC 8-2-12 (Wood Furniture and Cabinet Coating)

This source does not coat any wood furniture or cabinets. Therefore, the requirements of 326 IAC 8-2-12 are not applicable.

326 IAC 8-4-6 (Gasoline Dispensing Facilities)

Pursuant to 326 IAC 8-4-6 (8), "Gasoline dispensing facility" means any facility where gasoline is dispensed into motor vehicle fuel tanks or portable containers from a storage tank with a capacity of two thousand one hundred seventy-six (2,176) liters (five hundred seventy-five (575) gallons) or more. Pursuant to 326 IAC 8-4-6(a)(8), diesel fuel and kerosene are not considered to be motor vehicle fuels. The insignificant fuel dispensing operations at this source dispense gasoline and petroleum motor vehicle fuels from tanks with capacities less than seventy-six (2,176) liters (five hundred seventy-five (575) gallons). Therefore, the requirements of 326 IAC 8-4-6 are not applicable.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

There are no specific compliance monitoring requirements applicable to the facilities at this source. Due to the decrease in capacity at the woodworking operations, the allowable particulate emissions are less than ten (10) pounds per hour for the controlled woodworking operations. Therefore, The cyclone inspection requirement and visible emission notations requirements for the woodworking operations in the FESOP have been removed. There are no rules for particulate applicable to the surface coating operations. There is no specific compliance monitoring required for the uncontrolled VOC emissions, but a Preventive Maintenance Plan is required because the VOC emissions are uncontrolled and subject to applicable rules, and the potential VOC emissions are greater than twenty-five (25) tons per year.

Testing Requirements

Testing was required for the woodworking operations in the FESOP, F 085-14032-00067, issued on September 18, 2001. The unrestricted potential to emit PM and PM₁₀ from the woodworking is now less than one hundred (100) tons per year as a result of the proposed changes. Therefore, the FESOP limit, pursuant to 326 IAC 2-8-4, is no longer required. Therefore, the testing requirement has been removed from the permit. The woodworking is still required to comply with 326 IAC 6-3-2, and the control device parameters show compliance with that limit. Therefore, there are no testing requirements for this source.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

The name has been changed in all headers, on the cover page and on all forms, as follows:

~~Aero Manufacturing, Inc.~~ **Dutchmen Manufacturing, Inc.**

The mailing address in Section A.1 and on all forms is corrected, as follows:

Mailing Address: ~~925 W. Brooklyn, Syracuse, IN 46567~~ **305 Stuary Ave., Goshen, IN 46562**

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) **One (1) lamination machine located in Plant #1, constructed in February 1996, exhausting to vents V3 and V4, using roll coaters, bead coating, plastic squeeze bottles and wiping to apply material, capacity: 5.5 campers or trailers per hour.**
- (b) **One (1) travel trailer production line, consisting of the following:**
 - ~~(e)(1)~~ **One (1) woodworking area located in Plant #3 #4, constructed in February 1995, consisting of ~~saws, a sander and a router~~ various woodworking equipment, equipped with a cyclone (DC-2) and exhausting to stack DC2 with a process weight rate of 978 pounds of wood per hour, capacity: 2.5 trailers (24.4 pounds of wood input) per hour.**
 - (2) **One (1) travel trailer assembly area, located in Plant #4, using spray cans, brushes, and wiping to apply materials, capacity: 2.5 trailers per hour.**
 - ~~(b)(3)~~ **One (1) short and one (1) long travel trailer final finishing line, located in Plant #2 #3, constructed in August 2002, using spray cans and wiping to apply materials and equipped with a baghouse (PB) for particulate emissions from ~~saws three (3) airless paint guns~~, exhausting to stack PB, capacity: 5.74 2.5 trailers per hour.**
 - (4) **One (1) travel trailer touch-up and repair area, located in Plant #3, equipped with two (2) airless paint guns and also using wiping to apply materials, capacity: 0.5 trailer per hour.**
- (c) **One (1) fold-down camper production line, consisting of the following:**
 - ~~(a)(1)~~ **One (1) woodworking area located in Plant #1, consisting of ~~various woodworking equipment~~ ~~saws, a sander and a router~~, constructed in February 1995, equipped with a cyclone (DC-1) and exhausting to stack DC1, with a process weight rate of 2,760 pounds of wood per hour capacity: 3.0 fold-down campers (18.6 pounds of wood input) per hour.**
 - ~~(d)(2)~~ **The Dutchman Plant, consists of:**
 - ~~(1)~~ **One (1) fold-down camper assembly and final finishing line, located in Plant #2, equipped with ~~using spray cans, brushes, squeeze bottles, wiping, roller~~**

coating, and one (1) airless paint gun and one (1) laminating machine, exhausting to vents V3 and V4, capacity: 7.14-3.0 campers per hour.

- ~~(2) One (1) woodworking area, consisting of various woodworking equipment, equipped with a cyclone (DC-3) with a process weight rate of 34,200 pounds of wood per hour.~~
- (3) One (1) fold-down camper touch-up and repair area, located in Plant #2, equipped with two (2) airless paint guns and also using spray cans to apply materials, capacity: 0.5 camper per hour.**

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

~~(a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.~~

~~(b)~~**(a) Welding Stations (326 IAC 6-3-2), using less than 625 pounds of rod or weld wire per day.**

~~(c)~~**(b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:**

- (1) Twenty-two (22) radiant heaters, identified as H1 through H22, capacity: 0.06 million British thermal unit per hour, each.**
- (2) Four (4) radiant heaters, identified as H23 through H26, capacity: 0.1 million British thermal unit per hour, each.**
- (3) Seven (7) radiant heaters, identified as H29 through H33, H35 and H64, capacity: 0.20 million British thermal unit per hour, each.**
- (4) Five (5) space heaters, identified as H34, H36 through H38 and H45, capacity: 0.3 million British thermal unit per hour, each.**
- (5) Ten (10) space heaters, identified as H39 through H44 and H46 through H49, capacity: 0.25 million British thermal unit per hour, each.**
- (6) One (1) space heater, identified as H50, capacity: 0.075 million British thermal unit per hour.**
- (7) Two (2) radiant heaters, identified as H51 and H57, capacity: 0.175 million British thermal unit per hour, each.**
- (8) Five (5) radiant heaters, identified as H55, H56, H58, H59 and H60, capacity: 0.25 million British thermal unit per hour, each.**
- (9) Four (4) radiant heaters, identified as H54 and H61 through H63, capacity: 0.15 million British thermal units per hour, each.**

- (c) **Propane, liquified petroleum gas or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour, including tow trucks.**
- (d) **A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. This facility has a storage capacity of 250 gallons.**
- (e) **A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. This is a diesel fuel dispensing facility with a storage capacity of 300 gallons.**
- (f) **The following VOC and HAP storage containers:**
 - (1) **Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.**
 - (2) **Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.**
- ~~(d)~~(g) Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.
- ~~(e)~~(h) Paved and unpaved roads and parking lots with public access. **All roads are paved.**
- (i) **Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.**
- (j) **Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.**
- (k) **Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling towers.**

As stated in the "Compliance Requirements" section of this document, there are no specific compliance monitoring requirements for this source. Therefore, the Maintenance of Emission Monitoring Equipment, Pressure Gauge and Other Instrument Specifications, and Compliance Monitoring Plan requirements, have been removed from the permit as follows (the remainder of Section C is renumbered):

~~C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]~~

- ~~(a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no often less than once an hour until such time as the continuous monitor is back in operation.~~

- (b) ~~The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.~~

~~C.14 Pressure Gauge and Other Instrument Specifications [326 IAC 2-1.1-11] [326 IAC 2-8-4(3)]
[326 IAC 2-8-5(1)]~~

- (a) ~~Whenever a condition in this permit requires the measurement of pressure drop across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.~~
- (b) ~~Whenever a condition in this permit requires the measurement of a (temperature, flow rate, or pH level), the instrument employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus two percent ($\pm 2\%$) of full scale reading.~~
- (c) ~~The Permittee may request the IDEM, OAQ approve the use of a pressure gauge or other instrument that does not meet the above specifications provided the Permittee can demonstrate an alternative pressure gauge or other instrument specification will adequately ensure compliance with permit conditions requiring the measurement of pressure drop or other parameters.~~

~~C.17 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5]~~

- (a) ~~The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. The compliance monitoring plan can be either an entirely new document, consist in whole of information contained in other documents, or consist of a combination of new information and information contained in other documents. If the compliance monitoring plan incorporates by reference information contained in other documents, the Permittee shall identify as part of the compliance monitoring plan the documents in which the information is found. The elements of the compliance monitoring plan are:~~
- (1) ~~This condition;~~
- (2) ~~The Compliance Determination Requirements in Section D of this permit;~~
- (3) ~~The Compliance Monitoring Requirements in Section D of this permit;~~
- (4) ~~The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and~~
- (5) ~~A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of:~~
- (A) ~~Reasonable response steps that may be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and~~
- (B) ~~A time schedule for taking reasonable response steps including a schedule~~

~~for devising additional response steps for situations that may not have been predicted.~~

- ~~(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to take reasonable response steps may constitute a violation of the permit.~~
- ~~(c) Upon investigation of a compliance monitoring excursion, the Permittee is excused from taking further response steps for any of the following reasons:~~
 - ~~(1) A false reading occurs due to the malfunction of the monitoring equipment. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.~~
 - ~~(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.~~
 - ~~(3) An automatic measurement was taken when the process was not operating.~~
 - ~~(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.~~
- ~~(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.~~
- ~~(e) All monitoring required in Section D shall be performed at all times the equipment is operating. If monitoring is required by Section D and the equipment is not operating, then the Permittee may record the fact that the equipment is not operating or perform the required monitoring.~~
- ~~(f) At its discretion, IDEM may excuse the Permittee's failure to perform the monitoring and record keeping as required by Section D, if the Permittee provides adequate justification and documents that such failures do not exceed five percent (5%) of the operating time in any quarter. Temporary, unscheduled unavailability of qualified staff shall be considered a valid reason for failure to perform the monitoring or record keeping requirements in Section D.~~

All significant emission units have been combined into Section D.1. The woodworking, previously in Section D.2, is now identified as part of the travel trailer and fold-down camper production lines. Section D.3 is renamed as Section D.2. Changes are as follows:

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- ~~(b) One (1) short and one (1) long trailer final finishing line, located in Plant #2 equipped with three (3) airless paint guns, capacity: 5.71 trailers per hour.~~

~~The Dutchman Plant consists of:~~

- ~~(1) One (1) fold-down camper line, equipped with one (1) airless paint gun and one (1) laminating machine, capacity: 7.14 campers per hour.~~

- (a) One (1) lamination machine located in Plant #1, constructed in February 1996, exhausting to vents V3 and V4, using roll coaters, bead coating, plastic squeeze bottles and wiping to apply material, capacity: 5.5 campers or trailers per hour.

- (b) One (1) travel trailer production line, consisting of the following:

- (1) One (1) woodworking area located in Plant #4, constructed in February 1995, consisting of saws, a sander and a router, equipped with a cyclone (DC-2) and exhausting to stack DC2, capacity: 2.5 trailers (24.4 pounds of wood input) per hour.
- (2) One (1) travel trailer assembly area, located in Plant #4, using spray cans, brushes, and wiping to apply materials, capacity: 2.5 trailers per hour.
- (3) One (1) travel trailer final finishing line, located in Plant #3, constructed in August 2002, using spray cans and wiping to apply materials and equipped with a bag-house (PB) for particulate emissions from saws exhausting to stack PB, capacity: 2.5 trailers per hour.
- (4) One (1) travel trailer touch-up and repair area, located in Plant #3, equipped with two (2) airless paint guns and also using wiping to apply materials, capacity: 0.5 trailer per hour.

- (c) One (1) fold-down camper production line, consisting of the following:

- (1) One (1) woodworking area located in Plant #1, consisting of saws, a sander and a router, constructed in February 1995, equipped with a cyclone (DC-1) and exhausting to stack DC1, capacity: 3.0 fold-down campers (18.6 pounds of wood input) per hour.
- (2) One (1) fold-down camper assembly and final finishing line, located in Plant #2, using spray cans, brushes, squeeze bottles, wiping, roller coating, and one (1) airless paint gun, exhausting to vents V3 and V4, capacity: 3.0 campers per hour.
- (3) One (1) fold-down camper touch-up and repair area, located in Plant #2, equipped with two (2) airless paint guns and also using spray cans to apply materials, capacity: 0.5 camper per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

- ~~(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicators, when coating metal, at the one (1) short and one (1) long trailer final finishing line, located in Plant #2 and one (1) fold-down camper line located in Dutchman shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings except for lubricants and maintenance coatings.~~
- ~~(b) VOC delivered to the applicators from lubricants and maintenance coatings at one (1) short and one (1) long trailer final finishing line, located in Plant #2 and Dutchman, applied to metal, shall be limited to less than fifteen (15) pounds per day, each; therefore the requirements of 326 IAC 8-2-9 will not be applicable.~~
- ~~(c) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.~~

~~Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.~~

- (a) The VOC usage at the one (1) travel trailer production line shall be limited to less than fifteen (15) pounds per day when coating metal parts. This will limit the potential to emit VOC from the one (1) travel trailer production line to less than fifteen (15) pounds per day when coating metal parts, and shall make the requirements of 326 IAC 8-2-9, Miscellaneous Metal Coating Operations, not applicable.**
- (b) The VOC usage at the one (1) fold-down camper production line shall be limited to less than fifteen (15) pounds per day when coating metal parts. This will limit the potential to emit VOC from the one (1) fold-down camper production line to less than fifteen (15) pounds per day when coating metal parts, and shall make the requirements of 326 IAC 8-2-9, Miscellaneous Metal Coating Operations, not applicable.**

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-12]

~~The surface coating operations are subject to the requirements of 326 IAC 8-2-12 since the coatings are being applied to solid wood or wood composition.~~

~~Pursuant to 326 IAC 8-2-12 (Wood Furniture and Cabinet Coating), the surface coating applied to wood furniture and cabinets shall utilize one of the following application methods:~~

~~Airless Spray Application
Air Assisted Airless Spray Application
Electrostatic Spray Application
Electrostatic Bell or Disc Application
Heated Airless Spray Application
Roller Coating
Brush or Wipe Application
Dip and Drain Application~~

~~High Volume Low Pressure (HVLP) Spray Application is an accepted alternative method of application for Air Assisted Airless Spray Application. HVLP spray is the technology used to apply coating to substrate by means of coating application equipment which operates between one-tenth (0.1) and~~

~~ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system. The existing HVLP spray applicators used in the painting operation comply with this rule.~~

D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-11]

Pursuant to 326 IAC 8-2-11, the VOC content of coating delivered to the applicators for fabric coating shall be limited to 0.35 kilograms of VOC per liter (2.9 pounds per gallon) of coating excluding water, and the VOC content of coating delivered to the applicator for vinyl coating shall be limited to 0.58 kilograms of VOC per liter (4.8 pounds per gallon) of coating excluding water.

D.1.3 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

- (a) ~~Any change or modification which increases the potential to emit of VOC on plastic or fiberglass from the one (1) short and one (1) long trailer final finishing line, located in Plant #2 or from the one (1) fold-down camper line located in Dutchman to greater than 25.0 tons per year~~ **or more shall require prior approval from IDEM, OAQ prior to making the change.**
- (b) **The VOC usage from the total of all operations at the one (1) travel trailer production line shall be limited to less than 25 tons per twelve (12) consecutive month period, with compliance demonstrated at the end of each month. This will limit the potential to emit VOC from the one (1) travel trailer production line to less than 25 tons per year, and make the requirements of 326 IAC 8-1-6 not applicable.**

D.1.4 HAPs [326 IAC 2-4-1.1]

Any change or modification which may increase potential to emit any combination of HAPs from the entire source to twenty-five (25) tons per year or any single HAP to ten (10) tons per year or more shall require approval from IDEM, OAQ prior to making the change.

D.2-21.5PM₁₀ [326 IAC 2-8-4]

Any change or modification that increases the combined potential to emit PM₁₀ emissions from Plant #1, Plant #3 and Dutchman (wood) the woodworking area for the travel trailer production line, the woodworking area for the fold-down camper production line, and the saws at the travel trailer final finishing line shall be limited to a total of less than 21.0 pounds per hour; therefore, the requirements of 326 IAC 2-7 are not applicable. or more shall cause the potential to emit PM₁₀ from the entire source to be one hundred (100) tons per year or more and shall require prior IDEM, OAQ, approval.

D.1.56 Particulate Matter (PM) [326 IAC 6-3-2] [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM from the one (1) short and one (1) long travel trailer final finishing production line, located in Plant #2 and the one (1) fold-down camper production line located in Dutchman shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour.}$$

D.2-1.7 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e)(2), the particulate emission rate from each woodworking area shall not exceed 0.551 pound per hour, when operating at a process weight rate less than one

hundred (100) pounds per hour.

- (a) ~~The particulate matter (PM) from Plant #1 is limited to 5.09 pounds per hour based on a process weight rate of 2,760 pounds of wood per hour.~~
- (b) ~~The particulate matter (PM) from Plant #3 is limited to 2.54 pounds per hour based on a process weight rate of 978 pounds of wood per hour.~~
- (c) ~~The particulate matter (PM) from Dutchman (wood) is limited to 27.5 pounds per hour based on a process weight rate of 34,200 pounds of wood per hour.~~
- (d) ~~The particulate matter (PM) from one (1) fold-down camper line located in Dutchman and One (1) short and one (1) long trailer final finishing line, located in Plant #2 is limited by the equation below:~~
- (e) ~~The above limits were calculated by the following equation:~~

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

$$E = 4.10 P^{0.67} \text{ where } E = \text{rate of emission in pounds per hour and} \\ P = \text{process weight rate in tons per hour}$$

~~The cyclones shall be in operation at all times the Plant #1, Plant #3 and/or Dutchman (wood) are in operation, in order to comply with these limits.~~

D.1.68 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.79 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.1.1, **D.1.2 and D.1.3** shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) ~~using formulation data supplied by the coating manufacturer~~ **by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.**

D.2.41.10 Particulate Matter (PM)

The cyclones/**dust collectors** for **PM particulate** control shall be in operation and control emissions from ~~Plant #1, Plant #3 and Dutchman (wood)~~ **the woodworking area for the travel trailer production line and the woodworking area for the fold-down camper production line** at all times that these facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

There are no specific Compliance Monitoring Requirements applicable to these emission units.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.811 Record Keeping Requirements

-
- (a) To document compliance with Conditions D.1.1~~(a)~~, ~~D.1.3~~, and ~~D.1.4~~ the Permittee shall maintain records in accordance with (1) through ~~(5)~~ **(4)** below. Records maintained for (1) through ~~(5)~~ **(4)** shall be taken ~~monthly~~ **daily** and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1~~(a)~~, ~~D.1.3~~, and ~~D.1.4~~.
- (1) The ~~amount and~~ VOC content of each coating material and solvent used **on metal parts**. ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - (2) ~~A log of the dates of use;~~
 - ~~(3)~~ The cleanup solvent usage for each ~~month~~ **day, when coating metal parts;**
 - ~~(4)~~**(3)** The total VOC usage for each ~~month~~ **day, when coating metal parts;** and
 - ~~(5)~~**(4)** The weight of VOCs emitted, **when coating metal parts**, for each compliance period.
- (b) To document compliance with Conditions ~~D.1.1(b)~~ **D.1.3 and D.1.4** the Permittee shall maintain records in accordance with (1) through ~~(5)~~ **(4)** below. Records maintained for (1) through ~~(5)~~ **(4)** shall be taken ~~daily~~ **monthly** and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions **D.1.3 and D.1.4** ~~D.1.1(b)~~.
- (1) The ~~amount and~~ VOC and HAP content of each coating material and solvent used. ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
 - (2) ~~A log of the dates of use;~~
 - ~~(3)~~ The cleanup solvent usage for each ~~month~~ **day;**
 - ~~(4)~~**(3)** The total VOC and HAP usage for each ~~month~~ **day;** and
 - ~~(5)~~**(4)** The weight of VOCs and HAPs emitted for each compliance period.
- (c) **To document compliance with Condition D.1.2, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC content limits established in Condition D.1.2.**
- (1) **The VOC content of each coating material and solvent used on fabric and vinyl.**

(2) The amount of coating material and solvent used less water on daily basis for all fabric and vinyl coating.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(e)(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.912 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1(b) and D.1.3(b) shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

(a) One (1) woodworking area located in Plant #1, consisting of various woodworking equipment, equipped with a cyclone (DG-1) with a process weight rate of 2,760 pounds of wood per hour.

(b) One (1) woodworking area located in Plant #3, consisting of various woodworking equipment, equipped with a cyclone (DG-2) with a process weight rate of 978 pounds of wood per hour.

The Dutchman Plant consists of:

(2) One (1) woodworking area, consisting of various woodworking equipment, equipped with a cyclone (DG-3) with a process weight rate of 34,200 pounds of wood per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.2.5 Testing Requirements [326 IAC 2-8-5(a)(1), (4)] [326 IAC 2-1.1-11]

Within 180 days after issuance of this permit, in order to demonstrate compliance with Condition D.2.1 the Permittee shall perform PM and PM-10 testing utilizing methods as approved by the Commissioner. This test shall be repeated at least once every five (5) years from the date of this valid compliance demonstration. PM-10 includes filterable and condensable PM-10. Testing shall be conducted in accordance with Section C- Performance Testing.

D.2.6 Visible Emissions Notations

(a) Daily visible emission notations of Plant #1, Plant #3 and Dutchman (wood) stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

- ~~(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.~~
- ~~(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.~~
- ~~(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~D.2.7 Cyclone Inspections~~

~~An inspection shall be performed each calendar quarter of all cyclones controlling the woodworking operation when venting to the atmosphere. A cyclone inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors.~~

~~D.2.8 Cyclone Failure Detection~~

~~In the event that cyclone failure has been observed:~~

~~Failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B- Emergency Provisions). Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~D.2.9 Record Keeping Requirements~~

- ~~(a) To document compliance with Condition D.2.6, the Permittee shall maintain records of daily visible emission notations of the Plant #1, Plant #3 and Dutchman (wood) stack exhaust.~~
- ~~(b) To document compliance with Condition D.2.7, the Permittee shall maintain records of the results of the inspections required under Condition D.2.7 and the dates the vents are redirected.~~
- ~~(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.~~

SECTION D.3-2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

- ~~(a) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4,000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.~~
- ~~(b)(a) Welding Stations (326 IAC 6-3-2), using less than 625 pounds of rod or weld wire per day.~~
- (b) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including:**

 - (1) Twenty-two (22) radiant heaters, identified as H1 through H22, capacity: 0.06 million British thermal unit per hour, each.**
 - (2) Four (4) radiant heaters, identified as H23 through H26, capacity: 0.1 million British thermal unit per hour, each.**
 - (3) Seven (7) radiant heaters, identified as H29 through H33, H35 and H64, capacity: 0.20 million British thermal unit per hour, each.**
 - (4) Five (5) space heaters, identified as H34, H36 through H38 and H45, capacity: 0.3 million British thermal unit per hour, each.**
 - (5) Ten (10) space heaters, identified as H39 through H44 and H46 through H49, capacity: 0.25 million British thermal unit per hour, each.**
 - (6) One (1) space heater, identified as H50, capacity: 0.075 million British thermal unit per hour.**
 - (7) Two (2) radiant heaters, identified as H51 and H57, capacity: 0.175 million British thermal unit per hour, each.**
 - (8) Five (5) radiant heaters, identified as H55, H56, H58, H59 and H60, capacity: 0.25 million British thermal unit per hour, each.**
 - (9) Four (4) radiant heaters, identified as H54 and H61 through H63, capacity: 0.15 million British thermal units per hour, each.**
- (c) Propane, liquified petroleum gas or butane-fired combustion sources with heat input equal to or less than six million (6,000,000) Btu per hour, including tow trucks.**
- (d) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight, including tow trucks.**

- (e) **A gasoline fuel transfer and dispensing operation handling less than or equal to 1,300 gallons per day, such as filling of tanks, locomotives, automobiles, having a storage capacity less than or equal to 10,500 gallons. This facility has a storage capacity of 250 gallons.**
- (f) **A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month. This is a diesel fuel dispensing facility with a storage capacity of 300 gallons.**
- (g) **The following VOC and HAP storage containers:**
 - (1) **Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.**
 - (2) **Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.**
- (h) **Application of oils, greases lubricants or other nonvolatile materials applied as temporary protective coatings.**
- (i) **Paved and unpaved roads and parking lots with public access. All roads are paved.**
- (j) **Water based adhesives that are less than or equal to 5% by volume of VOCs excluding HAPs.**
- (k) **Purging of gas lines and vessels that is related to routine maintenance and repair of buildings, structures, or vehicles at the source where air emissions from those activities would not be associated with any production process.**
- (l) **Blowdown for any of the following: sight glass, boiler, compressors, pumps, and cooling towers.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3 2.1 Particulate Matter (PM) ~~[326 IAC 6-3-2]~~ [40 CFR 52 Subpart P]

Pursuant to 40 CFR 52 Subpart P, the particulate matter (PM) from the grinding, machining and welding operations shall be limited by the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

FESOP Monthly Report, submitted quarterly

Source Name: ~~Aero~~ **Dutchmen** Manufacturing, Inc.
Source Address: 925 W. Brooklyn, Syracuse, IN 46567
Mailing Address: ~~925 W. Brooklyn, Syracuse, IN 46567~~ **305 Stuary Ave., Goshen, IN 46562**
FESOP No.: F 085-14032-00067
Facility: One (1) ~~short and one (1) long travel trailer final finishing~~ **production** line, located in ~~Plant #2 and one (1) fold-down camper line located in Dutchman~~
Parameter: VOC **usage when coating metal parts**
Limit: Less than 15.0 pounds per day, ~~each~~

Months: _____ Year: _____

Day	VOC usage	VOC usage	VOC usage	Day	VOC usage	VOC usage	VOC usage
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				No. of deviations			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH**

FESOP Monthly Report, submitted quarterly

Source Name: Dutchmen Manufacturing, Inc.
Source Address: 925 W. Brooklyn, Syracuse, IN 46567
Mailing Address: 305 Stuary Ave., Goshen, IN 46562
FESOP No.: F 085-14032-00067
Facility: One (1) fold-down camper production line
Parameter: VOC usage when coating metal parts
Limit: Less than 15.0 pounds per day

Months: _____ Year: _____

Day	VOC usage	VOC usage	VOC usage	Day	VOC usage	VOC usage	VOC usage
1				17			
2				18			
3				19			
4				20			
5				21			
6				22			
7				23			
8				24			
9				25			
10				26			
11				27			
12				28			
13				29			
14				30			
15				31			
16				No. of deviations			

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.
Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

FESOP Quarterly Report

Source Name: Dutchmen Manufacturing, Inc.
Source Address: 925 W. Brooklyn, Syracuse, IN 46567
Mailing Address: 305 Stuary Ave., Goshen, IN 46562
FESOP No.: F 085-14032-00067
Facility: One (1) travel trailer production line
Parameter: VOC usage
Limit: Less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month

YEAR: _____

Month	VOC usage	VOC usage	VOC usage
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Conclusion

The construction and operation of this proposed revision shall be subject to the conditions of the attached proposed FESOP Significant Permit Revision No. 085-15722-00067.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Page 1 of 3 TSD App A

Company Name: Dutchmen Manufacturing, Inc.
Address City IN Zip: 925 West Brooklyn, Syracuse, Indiana 46567
Significant FESOP Revision: 085-15722
Plt ID: 085-00067
Reviewer: CarrieAnn Paukowits
Date: June 11, 2002

Material	Density (lbs/gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (units/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC (pounds per hour)	Potential VOC (pounds per day)	Potential VOC (tons per year)	Particulate Potential (tons/yr)	lbs VOC/gal solids	Transfer Efficiency	Substrate
Lamination																	
Dynasolve CU-5	8.84	100.00%	0.0%	100.0%	0.0%	0.00%	0.00550	5.500	8.84	8.84	0.27	6.42	1.17	0.00	n/a	100%	Wood
Hot melt adhesive 5621	8.17	0.00%	0.0%	0.0%	0.0%	100.00%	0.00530	5.500	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Wood, Fiberglass
Purfect Lok adhesive (9014)	8.80	0.00%	0.0%	0.0%	0.0%	100.00%	5.05000	5.500	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Wood, Wood panels
Uniplex 260 Cleaner	10.51	0.00%	0.0%	0.0%	0.0%	100.00%	0.15860	5.500	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Wood
Fold-down Camper																	
Wood working																	
Wood-lok adhesive	9.30	52.00%	51.8%	0.2%	52.0%	48.00%	0.08560	3.000	0.04	0.02	0.00	0.11	0.02	0.00	0.04	100%	Wood
Assembly and Final Finish																	
Crazy Clean 030	8.16	93.10%	85.3%	7.8%	83.5%	8.95%	0.01370	3.000	3.85	0.64	0.03	0.63	0.11	0.05	7.11	50%	Wood, Fiberglass, Metal
Glass Cleaner C-31	8.26	99.86%	87.9%	12.0%	83.7%	0.10%	0.00350	3.000	6.09	0.99	0.01	0.25	0.05	0.00	991.20	50%	Glass
Carpet adhesive	9.42	40.00%	34.2%	5.8%	28.1%	60.00%	0.25000	3.000	0.77	0.55	0.41	9.90	1.81	0.00	0.92	100%	Carpet
Geocel Stix adhesive	9.17	36.15%	0.0%	36.2%	0.0%	70.20%	0.05930	3.000	3.31	3.31	0.59	14.15	2.58	0.00	4.72	100%	Wood, Metal
Geocel Stairmatch sealant	13.34	3.70%	2.0%	1.7%	3.2%	94.08%	0.00250	3.000	0.23	0.23	0.00	0.04	0.01	0.00	0.24	100%	Wood, Metal
Roof lamination adhesive	9.10	0.00%	0.0%	0.0%	0.0%	100.00%	1.31870	3.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Wood, Fiberglass Reinforced Plastic
Parasil 1029 adhesive	8.76	5.00%	0.0%	5.0%	0.0%	95.00%	0.19850	3.000	0.44	0.44	0.26	6.26	1.14	0.00	0.46	100%	Wood
Russell 676 adhesive	5.70	82.80%	0.0%	82.8%	0.0%	12.00%	0.02930	3.000	4.72	4.72	0.41	9.96	1.82	0.19	39.33	50%	Wood, Wood panels
Seam sealing adhesive	7.59	90.00%	0.0%	90.0%	0.0%	9.00%	0.00010	3.000	6.83	6.83	0.00	0.05	0.01	0.00	75.07	50%	Wood panels
Tanner Glue	9.61	55.00%	55.0%	0.0%	62.0%	38.00%	0.04250	3.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Wood, Fiberglass Reinforced Plastics
Tanner Undercoating	9.30	75.00%	75.0%	0.0%	81.0%	19.00%	0.13740	3.000	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	Wood, Fiberglass Reinforced Plastics
Tile R Bond	7.42	98.31%	0.0%	98.3%	0.0%	1.50%	0.02700	3.000	7.29	7.29	0.59	14.18	2.59	0.00	486.31	100%	Wood, Metal
C33 silicone spray	5.92	92.00%	7.5%	84.5%	5.3%	0.00%	0.03070	3.000	5.28	5.00	0.46	11.06	2.02	0.10	n/a	50%	Metal
Pemco 3015 Anti-wicking	8.84	47.00%	44.0%	3.0%	46.6%	56.00%	0.00010	3.000	0.50	0.27	0.00	0.00	0.00	0.00	0.47	100%	Wood panels
WD 40 (maintenance)	6.84	78.00%	0.0%	78.0%	0.0%	30.00%	0.00030	3.000	5.34	5.34	0.00	0.12	0.02	0.00	17.78	50%	Metal
Camper Touch-up/ Repair																	
Acrylic primer surfacer	10.42	41.91%	0.0%	41.9%	0.0%	38.09%	0.00050	0.500	4.37	4.37	0.00	0.03	0.00	0.00	11.47	50%	Wood, Wood panels, Fiberglass
Hardener	8.95	16.10%	0.0%	16.1%	0.0%	78.00%	0.00850	0.500	1.44	1.44	0.01	0.15	0.03	0.00	1.85	50%	Wood, Wood panels, Fiberglass
Universal Blender	7.59	100.00%	0.0%	100.0%	0.0%	0.00%	0.00940	0.500	7.59	7.59	0.04	0.86	0.16	0.00	n/a	50%	Wood, Wood panels, Fiberglass
Spray N Go paint	6.67	78.00%	0.0%	78.0%	0.0%	9.96%	0.01690	0.500	5.20	5.20	0.04	1.06	0.19	0.03	52.23	50%	Metal
Touch N' Tone paint	5.59	65.00%	0.0%	65.0%	0.0%	13.11%	0.00820	0.500	3.63	3.63	0.01	0.36	0.07	0.02	27.72	50%	Wood panels
Travel Trailer																	
Wood working																	
Wood-lok adhesive	9.30	52.00%	51.8%	0.2%	52.0%	48.00%	0.15830	2.500	0.04	0.02	0.01	0.18	0.03	0.00	0.04	100%	Wood
Trailer Assembly																	
Crazy Clean 030	8.16	93.10%	85.3%	7.8%	83.5%	8.95%	0.00150	2.500	3.85	0.64	0.00	0.06	0.01	0.00	7.11	50%	Wood, Wood panels, Fiberglass
Glass Cleaner C-31	8.26	99.86%	87.9%	12.0%	83.7%	0.10%	0.00220	2.500	6.09	0.99	0.01	0.13	0.02	0.00	991.20	50%	Glass
Cyclo cleaner	8.34	98.00%	88.0%	10.0%	88.0%	2.00%	0.00100	2.500	6.95	0.83	0.00	0.05	0.01	0.00	41.70	50%	Wood panels, Fiberglass
Ener 10 cleaner	7.99	95.80%	95.8%	0.0%	96.0%	4.00%	0.00100	2.500	0.00	0.00	0.00	0.00	0.00	0.00	0.00	50%	Wood, Fiberglass Reinforced Plastics
Enerfoam RV	10.08	0.00%	0.0%	0.0%	0.0%	100.00%	0.02590	2.500	0.00	0.00	0.00	0.00	0.00	1.43	0.00	50%	Wood, Fiberglass Reinforced Plastics
Roof self-leveling sealant	9.92	32.50%	1.9%	30.6%	2.2%	61.30%	0.06300	2.500	3.10	3.04	0.48	11.47	2.09	0.00	4.95	100%	Wood, Fiberglass Reinforced Plastics
901 BA adhesive	8.40	44.00%	0.0%	44.0%	0.0%	55.00%	0.62500	2.500	3.70	3.70	5.78	138.60	25.29	0.00	6.72	100%	Wood, Fiberglass Reinforced Plastics, Vinyl
IPS Weld-on cement	7.30	72.50%	0.0%	72.5%	0.0%	31.25%	0.02490	2.500	5.29	5.29	0.33	7.91	1.44	0.00	16.94	100%	Wood, Fiberglass Reinforced Plastics
Parasil 1029 adhesive	8.76	5.00%	0.0%	5.0%	0.0%	95.00%	0.00090	2.500	0.44	0.44	0.00	0.02	0.00	0.00	0.46	100%	Wood, Fiberglass Reinforced Plastics, Carpet
Russell 676 adhesive	5.70	82.80%	0.0%	82.8%	0.0%	12.00%	0.01560	2.500	4.72	4.72	0.18	4.42	0.81	0.08	39.33	50%	Wood, Wood panels, Metal
Tile R Bond	7.42	98.31%	0.0%	98.3%	0.0%	1.50%	0.01130	2.500	7.29	7.29	0.21	4.95	0.90	0.00	486.31	100%	Wood, Metal
C33 silicone spray	5.92	92.00%	7.5%	84.5%	5.3%	0.00%	0.00470	2.500	5.28	5.00	0.06	1.41	0.26	0.01	n/a	50%	Wood, Metal, Fiberglass Reinforced Plastics
Fiberglass body filler	13.00	25.00%	6.4%	18.6%	6.1%	61.00%	0.00130	2.500	2.57	2.42	0.01	0.19	0.03	0.00	3.96	100%	Fiberglass
Spray N Go paint (touch-up)	6.67	78.00%	0.0%	78.0%	0.0%	9.96%	0.00090	2.500	5.20	5.20	0.01	0.28	0.05	0.01	52.23	50%	Metal
Pemco 3015 Anti-wicking	8.84	47.00%	44.0%	3.0%	46.6%	56.00%	0.06140	2.500	0.50	0.27	0.04	0.98	0.18	0.00	0.57	100%	Wood, Metal
WD 40 (maintenance)	6.84	78.00%	0.0%	78.0%	0.0%	30.00%	0.00030	2.500	5.34	5.34	0.00	0.10	0.02	0.00	17.78	50%	Wood panels, Metal
Rubbing compound	9.59	65.00%	45.0%	20.0%	50.0%	28.00%	0.00200	2.500	3.84	1.92	0.01	0.23	0.04	0.00	6.85	100%	Wood, Wood panels
Polyester glazing putty	14.90	20.00%	6.2%	13.8%	11.0%	64.40%	0.00340	2.500	2.31	2.06	0.02	0.42	0.08	0.22	3.19	50%	Wood, Fiberglass
Trailer Final Finish																	
IPS Weld-on cement	7.30	77.50%	0.0%	77.5%	0.0%	30.00%	0.00320	2.500	5.66	5.66	0.05	1.09	0.20	0.00	18.86	100%	Wood, Fiberglass Reinforced Plastics
Isopropyl Alcohol	6.55	100.00%	0.0%	100.0%	0.0%	0.00%	0.00630	2.500	6.55	0.10	2.48	0.45	0.00	n/a	n/a	100%	Wood, Wood panels
Pre-clean	6.23	100.00%	0.0%	100.0%	0.0%	0.00%	0.02840	2.500	6.23	6.23	0.44	10.62	1.94	0.00	n/a	100%	Wood, Wood panels
Touch N' Tone paint (touch-up)	5.59	65.00%	0.0%	65.0%	0.0%	13.11%	0.00160	2.500	3.63	3.63	0.01	0.35	0.06	0.02	27.72	50%	Wood, Metal
Trailer Touch-up/Repair																	
Cyclo Cleaner	8.34	98.00%	88.0%	10.0%	88.0%	2.00%	0.09890	0.500	6.95	0.83	0.04	0.99	0.18	0.02	41.70	50%	Wood panels, Fiberglass
Pre-Clean	6.25	100.00%	0.0%	100.0%	0.0%	0.00%	0.03210	0.500	6.25	6.25	0.10	2.41	0.44	0.00	n/a	100%	Wood, Wood panels
Spray N Go paint (touch-up)	6.67	78.00%	0.0%	78.0%	0.0%	9.96%	0.00090	0.500	5.20	5.20	0.00	0.06	0.01	0.00	52.23	50%	Metal
Touch N' Tone paint (touch-up)	5.59	65.00%	0.0%	65.0%	0.0%	13.11%	0.00110	0.500	3.63	3.63	0.00	0.05	0.01	0.00	27.72	50%	Wood panels, Metal
Acrylic primer surfacer	10.42	41.91%	0.0%	41.9%	0.0%	38.90%	0.00100	0.500	4.37	4.37	0.00	0.05	0.01	0.01	11.23	50%	Wood, Wood panels, Fiberglass
Hardener	8.95	16.10%	0.0%	16.1%	0.0%	78.00%	0.00070	0.500	1.44	1.44	0.00	0.01	0.00	0.01	1.85	50%	Wood, Wood panels, Fiberglass
Universal Blender	7.59	100.00%	0.0%	100.0%	0.0%	0.00%	0.02000	0.500	7.59	7.59	0.08	1.82	0.33	0.00	n/a	50%	Wood, Wood panels, Fiberglass

State Potential Emissions Add worst case coating to all solvents

PM
Control Efficiency
Uncontrolled
Controlled

11.1
11.1

267
267

48.7
48.7

2.27
2.27

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lbs/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lbs/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lbs/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1-Weight % Volatiles) * (1-Transfer efficiency) * (8760 hrs/yr) * (1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

Appendix A: Emission Calculations
HAP Emission Calculations

Page 2 of 3 TSD App A

Company Name: Dutchmen Manufacturing, Inc.
Address City IN Zip: 925 West Brooklyn, Syracuse, Indiana 46567
Significant FESOP Revision: 085-15722
Pit ID: 085-00067
Reviewer: CarrieAnn Paukowitz
Date: June 11, 2002

Material	Density (lbs/gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Vinyl acetate	Weight % Methanol	Weight % Toluene	Weight % Hexane	Weight % DEHP	Weight % MEK	Weight % Xylenes	Weight % Dibutylphthalate	Weight % Ethylbenzene	Weight % Styrene	Weight % Formaldehyde	Weight % Glycol Ethers	Weight % HDI	Weight % MDI	Vinyl acetate Emissions (tons/yr)	Methanol Emissions (tons/yr)	Toluene Emissions (tons/yr)	Hexane Emissions (tons/yr)	DEHP Emissions (tons/yr)	MEK Emissions (tons/yr)	Xylene Emissions (tons/yr)	Dibutylphthalate Emissions (tons/yr)	Ethyl benzene Emissions (tons/yr)	Styrene Emissions (tons/yr)	Formaldehyde Emissions (tons/yr)	Glycol Ethers Emissions (tons/yr)	HDI Emissions (tons/yr)	MDI Emissions (tons/yr)	
Lamination																																
Dynasolve CU-5	8.84	0.00550	5.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Hot melt adhesive 5621	8.17	0.00530	5.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Purfect Lok adhesive (9014)	8.80	0.05000	5.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	see below	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Uniplex 260 Cleaner	10.51	0.15860	5.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Fold-down Camper																																
Wood working																																
Wood-lok adhesive	9.30	0.08560	3.000	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.105	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Assembly and Final Finish																																
Crazy Clean 030	8.16	0.01370	3.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Glass Cleaner C-31	8.26	0.00350	3.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Carpet adhesive	9.42	0.25000	3.000	0.00%	1.90%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.588	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Geocol Stix adhesive	9.17	0.05930	3.000	0.00%	10.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.715	0.715	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Geocol Stairmatch sealant	13.34	0.00250	3.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Roof lamination adhesive	9.10	1.31870	3.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	see below	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Parasil 1029 adhesive	8.76	0.19850	3.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Russell 676 adhesive	5.70	0.02930	3.000	0.00%	0.00%	0.00%	35.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.768	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Seam sealing adhesive	7.59	0.00010	3.000	0.00%	0.00%	0.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Tanner Glue	9.61	0.04250	3.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Tanner Undercoating	9.30	0.13740	3.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Tite R Bond	7.42	0.02700	3.000	0.00%	0.00%	2.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
C33 silicone spray	5.92	0.03070	3.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Pemco 3015 Anti-wicking	8.84	0.00010	3.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
WD 40 (maintenance)	6.84	0.00030	3.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Camper Touch-up/Repair																																
Acrylic primer surfacer	10.42	0.00050	0.500	0.00%	0.00%	30.00%	0.00%	0.00%	10.00%	10.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.003	0.000	0.000	0.001	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Hardener	8.95	0.00850	0.500	0.00%	0.00%	0.00%	50.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.00%	0.00%	0.00%	0.083	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Universal Blender	7.59	0.00940	0.500	0.00%	0.00%	20.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.031	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Spray N Go paint	6.67	0.01690	0.500	0.00%	0.00%	20.00%	0.00%	0.00%	10.00%	5.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.049	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Touch N' Tone paint	5.59	0.00820	0.500	0.00%	0.00%	15.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.015	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Travel Trailer																																
Wood-lok adhesive																																
Wood-lok adhesive	9.30	0.15830	2.500	1.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.161	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Trailer Assembly																																
Crazy Clean 030	8.16	0.00150	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Glass Cleaner C-31	8.26	0.00220	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Cyclo cleaner	8.34	0.00100	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Ener 10 cleaner	7.99	0.00100	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Enerfoam RV	10.08	0.02590	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	60.00%	0.00%	0.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Roof self-leveling sealant	9.92	0.06300	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
901 BA adhesive	8.40	0.62500	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
IPS Well-on cement	7.30	0.02490	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	72.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.443	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	
Parasil 1029 adhesive	8.76	0.00090	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Russell 676 adhesive	5.70	0.01560	2.500	0.00%	0.00%	0.00%	35.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Tite R Bond	7.42	0.01130	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
C33 silicone spray	5.92	0.00470	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Fiberglass body filler	13.00	0.00130	2.500	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	25.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
Spray N Go paint (touch-up)	6.67	0.00090	2.500	0.00%	0.00%	20.00%	0.00%	0.00%	10.00%	5.00%	0.00%	0																				

**Appendix A: Emission Calculations
Cyclone and Baghouse Operations**

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Company Name: Dutchmen Manufacturing, Inc.
Address City IN Zip: 925 West Brooklyn, Syracuse, Indiana 46567
Significant FESOP Revision: 085-15722
Plt ID: 085-00067
Reviewer: CarrieAnn Paukowits
Date: June 11, 2002

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	Emission Rate before Controls (lb/hr)	Emission Rate before Controls (tons/yr)	Emission Rate after Controls (lb/hr)	Emission Rate after Controls (tons/yr)
DC-1 (Cyclone/Dust collector)	90.0%	0.0083000	3900.0	2.77	12.2	0.277	1.22
DC-2 (Cyclone/Dust collector)	90.0%	0.0051000	3900.0	1.70	7.47	0.170	0.747
PB (baghouse)	99.0%	0.0004800	1200.0	0.49	2.16	0.005	0.022
Totals:				4.97	21.8	0.453	1.98

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)

Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)